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ATTACHMENT 2

Annual 47 C.F.R. § 64.2009(e) CPNI Certification Template

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2014 covering the prior calendar year 2013

1. Date filed: 2.24.2014
2. Name of company(s) covered by this certification: American Broadband, Inc.
3. Form 499 Filer ID: 822698
4. Name of signatory: Tim Kinnear
5. Title of signatory: Chief Financial Officer
6. Certification:

I, Tim Kinnear, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. [NOTE: If you reply in the affirmative, provide an explanation of any actions taken against data brokers.]

The company has not received customer complaints in the past year concerning the unauthorized release of CPNI [NOTE: If you reply in the affirmative, provide a summary of such complaints. This summary must include the number of complaints, broken down by category or complaint, *e.g.*, instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information.]

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17, which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed Tim Kinnear Chief Financial Officer

Attachments: Accompanying Statement explaining CPNI procedures
Explanation of actions taken against data brokers (if applicable)
Summary of customer complaints (if applicable)

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UNSi

Accompanying Statement explaining CPNI procedures

Carriers are prohibited from releasing call detail information to customers during customer-initiated telephone contacts, except when the customer has previously established a password for their account. UNSi establishes customer contacts that are authorized to receive this information and they will not be given the information over the phone but via an email to the address that has been established when the account has been setup. The Customer support center is trained to identify the authorized contact and will deny CPNI access to any other contact.

Carriers must provide mandatory password protection for online account access. UNSi provides online account access to CPNI only with a password that is initially established with a randomly-generated PIN delivered to the customer via email when the account is initially set up. The customer may designate additional employees that has access to the CPNI information and their contact information is stored in the UNSI CRM platform. The primary account holder, may designate a more limited online access rights for other additional users. All this is documented and keep track under the UNSi customer database.

Carriers may provide CPNI to customers in a retail location with a valid government issued photo ID.
This section does not pertain to UNSi as UNSi does not have any retail locations.

Carriers must notify their customers when a password, address, and certain other account changes occur.
UNSi policy is to email the customer's a message confirming them of the change to the account and account information. The email has instructions for the customer to contact UNSi Service Change group if the change was not authorized or made in error.

3220 Keller Springs Road, Suite 108
Carrollton, TX 75006
p 469.791.0000
f 469.374.9193
unsi.net

Carriers must establish a notification process for both law enforcement and customers in the event of a CPNI breach. Specifically, carriers must notify the United States Secret Service ("USSS") and the Federal Bureau of Investigation ("FBI") after discovering a breach of CPNI.

UNSi policy is to inform the correct branch of government whenever a breach of the CPNI information event has occurred. It is UNSi policy to formally notify the correct group within 7 days of the event.

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